

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CHELSEA GILLIAM,

Plaintiff,

v.

DEPARTMENT OF PUBLIC SAFETY AND
CORRECTIONAL SERVICES, *et al.*

Defendants.

Civil Action No. 1:23-CV-1047

SUGGESTION OF BANKRUPTCY AND NOTICE OF AUTOMATIC STAY

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. (“TCS” or the “Debtor”), one of the named defendants herein, files this *Suggestion of Bankruptcy and Notice of Automatic Stay* and would respectfully show as follows:

1. On February 13, 2023 (the “Petition Date”), TCS filed a voluntary petition pursuant to chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”). The case is pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, under Case No. 23-90086 (CML) (the “Chapter 11 Case”).

2. As a result of the commencement of the Chapter 11 Case, section 362 of the Bankruptcy Code operates as a stay, applicable to all entities, of (i) commencement or continuation of a judicial, administrative or other action or proceeding against the Debtor that was or could have been commenced before the commencement of the Chapter 11 Case, or to recover a claim against the Debtor that arose before the commencement of the Chapter 11 Case; (ii) the enforcement, against the Debtor or against the property of their bankruptcy estates, of a judgment obtained before the commencement of the Chapter 11 Case; (iii) any act to obtain

possession of property of the estate or of property from the estates or to exercise control over property of the Debtor's estate; and (iv) any act to create, perfect, or enforce a lien against property of the Debtors' estate.

3. The stay set forth in 11 U.S.C. § 362(a) became effective automatically upon the commencement of the Chapter 11 Case. If any party violates the stay, the Debtor may seek to have such actions deemed void, move for sanctions in the Bankruptcy Court and recover actual damages, including costs and attorneys' fees, arising from the violation of the stay.

**MARKS, O'NEILL, O'BRIEN, DOHERTY &
KELLY, P.C.**

By: /s/ Megan T. Mantzavinos

Megan T. Mantzavinos

Bar Number: 16416

mmantzavinos@moodklaw.com

600 Baltimore Avenue, #305

Towson, Maryland 21204

(410) 339-6880

(410) 339-6881 (Fax)

Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 8th day of May 2023, a copy of the foregoing document was electronically transmitted to this court and mailed first class, postage pre-paid to:

Eve L. Hill, Esq.
Brown, Goldstein & Levy, LLP
120 E. Baltimore Street, Suite 2500
Baltimore, Maryland 21202
Attorneys for Plaintiff

/s/ Megan T. Mantzavinos

Megan T. Mantzavinos